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7
8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. *2011-478*

11 **CHERIE MAROUSE**
12 **AKA SHUNZHI ZHOU**
13 **1142 S. Diamond Bar Blvd., # 210**
14 **Diamond Bar, CA 91765**

A C C U S A T I O N

15 **Registered Nurse License No. 535750**

16 Respondent.

17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
20 official capacity as the Interim Executive Officer of the Board of Registered Nursing ("Board"),
21 Department of Consumer Affairs.

22 **Registered Nurse License**

23 2. On or about August 21, 1997, the Board issued Registered Nurse License Number
24 535750 to Cherie Marouse, aka Shunzhi Zhou ("Respondent"). The registered nurse license was
25 in full force and effect at all times relevant to the charges brought herein and will expire on
26 December 31, 2012, unless renewed.

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1 8. On or about August 14, 2008, pursuant to a Consent Order, in the disciplinary action
2 entitled *Before the Virginia Board of Nursing, In Re: Cherie S. Marouse, R.N.*, the Virginia Board
3 issued a REPRIMAND on Respondent's nursing license.

4 9. The Virginia Board based its Order on the following facts:

5 a. On or about March 2008, Respondent was employed as an RN at Mary Washington
6 Hospital, located in Fredericksburg, Virginia.

7 b. On or about March 23, 2008, while on duty at the hospital, Respondent failed to
8 complete two required assignments of a mother and her baby but documented having
9 completed them.

10 **SECOND CAUSE FOR DISCIPLINE**

11 **(Unprofessional Conduct)**

12 10. Respondent is subject to discipline under Code section 2761, subdivision (a), on the
13 grounds of unprofessional conduct, Respondent committed acts constituting unprofessional
14 conduct, as more particularly set forth in paragraphs 7 through 9, above.

15 **PRAYER**


16 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
17 and that following the hearing, the Board of Registered Nursing issue a decision:

18 1. Revoking or suspending Registered Nurse License Number 535750, issued to Cherie
19 Marouse, aka Shunzhi Zhou ;

20 2. Ordering Cherie Marouse, aka Shunzhi Zhou to pay the Board of Registered Nursing
21 the reasonable costs of the investigation and enforcement of this case, pursuant to Business and
22 Professions Code section 125.3; and,

23 3. Taking such other and further action as deemed necessary and proper.

24 DATED: November 23, 2010

25 
26 LOUISE R. BAILEY, M.Ed., RN
27 Interim Executive Officer
28 Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

LA2010504833